

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	Case No. 4:20-CR-00212
)	
DEBRA LYNN MERCER-ERWIN (1))	
)	
Defendants.)	

**DEFENDANT DEBRA LYNN MERCER-ERWIN’S MOTION TO JOIN
AND ADOPT DEFENDANT KAYLEIGH MOFFETT’S MOTION TO SUPPRESS
AND REQUEST FOR A FRANKS HEARING**

The Defendant, Debra Lynn Mercer-Erwin (the “Defendant”), through her attorney of record, Joe E. White, Jr., respectfully requests permission to join and adopt the law and argument raised in Defendant Kayleigh Moffett’s Motion to Suppress and Request for a Franks Hearing [Dkt. #324] (the “Motion to Suppress”).

CONCLUSION

In an effort to promote judicial economy and because the Defendant shares the arguments raised in the Motion to Suppress, the Defendant requests that she be allowed to join and adopt the law and argument raised by Defendant Kayleigh Moffett’s Motion to Suppress.

Respectfully submitted,

s/ Joe E. White, Jr.
JOE E. WHITE, JR. OBA #12930
CHARLES C. WEDDLE III OBA #18869
KATE C. WHITE OBA # 30930
MATTHEW P. CYRAN OBA # 16918
WHITE & WEDDLE, P.C.
630 N.E. 63rd Street
Oklahoma City, Oklahoma 73105
(405) 858-8899
(405) 858-8844 FAX

joe@whiteandweddle.com
charles@whiteandweddle.com
kate@whiteandweddle.com
matt@whiteandweddle.com

*Attorneys for the Defendant,
Debra Lynn Mercer-Erwin*

CERTIFICATE OF DELIVERY

☒ I hereby certify that on this 6th day of March, 2023, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing, which will automatically send e-mail notification of such filing to all attorneys of record.

s/ Joe E. White, Jr.
JOE E. WHITE, JR.